

1 COLLEEN BAL (*pro hac vice*)
2 cbal@wsgr.com
3 BART E. VOLKMER (*pro hac vice*)
4 bvolkmer@wsgr.com
5 WILSON SONSINI GOODRICH & ROSATI
6 650 Page Mill Road
7 Palo Alto, Ca 94304-1050
8 Telephone: (650) 493-9300
9 Facsimile: (650) 493-6811

10 KURT OPSAHL (*pro hac vice*)
11 kurt@eff.org
12 CORYNNE MCSHERRY (*pro hac vice*)
13 corynne@eff.org
14 ELECTRONIC FRONTIER FOUNDATION
15 454 Shotwell Street
16 San Francisco, Ca 94110
17 Telephone: (415) 436-9333
18 Facsimile: (415) 436-9993

19 CHAD BOWERS
20 bowers@lawyer.com
21 CHAD A. BOWERS, LTD
22 Nevada State Bar No. 7283
23 3202 West Charleston Boulevard
24 Las Vegas, Nevada 89102
25 Telephone: (702) 457-1001

26 Attorneys For Defendant & Counterclaimant
27 THOMAS A. DIBIASE

28 **UNITED STATES DISTRICT COURT**

1 **DISTRICT OF NEVADA**

2 Righthaven LLC, a Nevada limited-
3 liability company,

4) CASE NO.: 2:10-cv-01343-RLH-PAL

5 Plaintiff,

6) **JOINT STIPULATION AND PROPOSED
7 ORDER REQUESTING THE
8 RESCHEDULING OF MOTION TO
9 COMPEL HEARING CURRENTLY SET
10 FOR JUNE 28, 2011
11 (First Request)**

12 v.

13 THOMAS A. DIBIASE, an individual,

14 Defendant.

15 THOMAS A. DIBIASE, an individual,

16 Counterclaimant,

17 v.

18 Righthaven LLC, a Nevada limited-
19 liability company,

20 Counter-defendant.

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1 WHEREAS, on May 25, 2011, the Court set a Motion Hearing for June 28, 2011, at
2 10:30 AM, in Las Vegas Courtroom 3B before Magistrate Judge Peggy A. Leen, to hear
3 argument on Defendant/ Counterclaimant Thomas A. DiBiase's Motion to Compel the
4 Production of Documents from Plaintiff/Counterdefendant Righthaven LLC (Dkt. 53);

5 WHEREAS, Mr. DiBiase's reply in support of his Motion to Compel is due on or before
6 June 20, 2011;

7 WHEREAS, the parties have meet and conferred regarding the schedule and agreed that:

8 IT IS HEREBY STIPULATED BETWEEN Plaintiff/Counterdefendant, Righthaven LLC
9 ("Righthaven"), through its attorneys of record and Defendant/Counterclaimant, Thomas A.
10 Dibiase's through their attorneys of record (collectively, the "Parties"), that DiBiase's Reply in
11 support of his Motion to Compel shall be due on or before June 23, 2011. Furthermore, the
12 Parties respectfully request that this Court move the Motion Hearing to **June 30, 2011** at a time
13 convenient to the Court.

14 The Parties respectfully request the Court to reschedule the Motion Hearing for a later
15 date as an accommodation to the schedules of counsel appearing in this action from outside of
16 the jurisdiction, who will already be in Las Vegas to attend a hearing in another matter on June
17 30, which is set for 10:30 a.m.. This stipulation is sought in good faith and not for purposes of
18 delay.

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20 DATED: June 16, 2011

21 WILSON SONSINI GOODRICH & ROSATI

SHAWN A. MANGANO, LTD.

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23 By: /s/ Bart E. Volkmer
Colleen Bal, Esq.
Bart E. Volkmer, Esq.
650 Page Mill Road
Palo Alto, California 94304-1050

24 By: /s/ Shawn A. Mangano
Shawn A. Mangano, Esq.
9960 West Cheyenne Avenue
Suite 170
Las Vegas, Nevada 89129

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27 THE ELECTRONIC FRONTIER
28 FOUNDATION
Kurt Opsahl, Esq.

*Attorney for Plaintiff and Counter-
Defendant Righthaven LLC*

1 Corynne McSherry, Esq.
2 454 Shotwell Street
3 San Francisco, California 94110

4 CHAD A. BOWERS, LTD.
5 Chad A. Bowers, Esq.
3202 West Charleston Boulevard
Las Vegas, Nevada 89102

6 *Attorneys for Defendant and*
7 *Counterclaimant Thomas A. DiBiase*

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9 **ORDER**

10 The hearing currently scheduled for June 28, 2011, at 10:30 a.m., shall be
11 **VACATED** and **CONTINUED** to **June 30, 2011, at 9:30 a.m.**, in Courtroom 3B.
Dated this 22nd day of June, 2011.

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14 Peggy A. Leen
United States Magistrate Judge

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